

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and	)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,	)	
	)	Honorable Aleta A. Trauger
Plaintiff,	)	
	)	LEAD PLAINTIFF’S MOTION TO
vs.	)	COMPEL DEFENDANTS TO FURTHER
	)	RESPOND TO INTERROGATORIES
CORRECTIONS CORPORATION OF	)	
AMERICA, et al.,	)	
	)	
Defendants.	)	
_____	)	

PLEASE TAKE NOTICE that, pursuant to this Court's July 16, 2020 Order (ECF No. 244) and Federal Rules of Civil Procedure 33 and 37, Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund ("Plaintiff"), on behalf of itself and the class of investors who purchased Corrections Corporation of America ("CCA," now doing business as CoreCivic, Inc.) securities between February 27, 2012 and August 17, 2016, inclusive, respectfully moves this Court for an order compelling CCA and its executive Defendants<sup>1</sup> to provide complete and non-evasive responses to interrogatories served on them in this action. This Motion is based on the concurrently filed Memorandum of Law in support thereof, the Declaration of Willow E. Radcliffe and exhibits thereto, and such other evidence and argument as the Court may consider.

DATED: July 27, 2020

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WILLOW E. RADCLIFFE  
KENNETH J. BLACK

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s/ Willow E. Radcliffe  
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<sup>1</sup> Defendants are CCA, Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on July 27, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Willow E. Radcliffe

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Case 3:16-cv-02267 Document 254 Filed 07/27/20 Page 5 of 6 PageID #: 7450

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